

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

(1) RODNEY G. WRIGHT,	)	
	)	
Plaintiff,	)	
	)	Case No. CIV-17-73-W
v.	)	
	)	
(2) LIBERTY MUTUAL INSURANCE	)	
COMPANY, a foreign corporation,	)	
	)	
Defendant.	)	

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1332, 1441, and 1446, Defendant Liberty Mutual Insurance Company ("Defendant") hereby removes the above-captioned action from the District Court of Oklahoma County, State of Oklahoma, to the United States District Court for the Western District of Oklahoma. In support of this removal, Defendant states as follows:

1. On December 23, 2016, Plaintiff Rodney G. Wright ("Plaintiff") commenced an action in the District Court of Oklahoma County, Oklahoma, entitled *Rodney G. Wright v. Liberty Mutual Insurance Company*, Case No. CJ-2016-6533 (the "State Court Action"). A true copy of the state court docket sheet is attached as Exhibit 1. All process, pleadings, and orders filed or served in the State Court Action are attached hereto as Exhibits 2 through 3.

2. According to the Petition, Plaintiff is a citizen of Oklahoma. Defendant is a company organized under the laws of the State of Massachusetts with its principal place of business in Boston, Massachusetts.

3. In accordance with 28 U.S.C. § 1446(b)(1), this action has been removed within thirty (30) days of the service of Plaintiff's Petition on Defendant on January 5, 2017.

4. The Western District of Oklahoma includes the state judicial district in which Plaintiff filed his Petition.

5. This is a civil action over which this Court has original jurisdiction based on diversity of citizenship and amount in controversy pursuant to 28 U.S.C § 1332, and which may be removed to this Court pursuant to 28 U.S.C. §§ 1441 and 1446.

6. Contemporaneous with Defendant's filing of this Notice, Defendant will serve written notice to Plaintiff's counsel of this filing, as required by 28 U.S.C. § 1446(d).

7. Defendant shall likewise file a true and correct copy of its Notice of Removal with the Clerk of the District Court in and for Oklahoma County, State of Oklahoma, as required by 28 U.S.C. §1446(d).

Respectfully submitted,

s/Margo E. Shipley

William W. O'Connor, OBA No. 13200

Margo E. Shipley, OBA No. 32118

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**ATTORNEYS FOR DEFENDANT,  
LIBERTY MUTUAL INSURANCE COMPANY**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 24th day of January, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

Philip O. Watts  
Jennifer A. Bruner  
Shawn D. Fulkerson  
Carolie E. Rozell

**ATTORNEYS FOR PLAINTIFFS**

s/Margo E. Shipley  
Margo E. Shipley